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ATTORNEY FOR DEFENDANT
LIBORIO RUIZ LOPEZ, JR.

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CR.-S-03-362-GEB
PLAINTIFF,)	STIPULATION AND PROPOSED ORDER
v.)	TO CONTINUE STATUS CONFERENCE
LIBORIO RUIZ LOPEZ, JR.,et al.,)	
DEFENDANTS.)	

Plaintiff United States of America, by its counsel, Assistant United States Attorney, Mr. Phillip A. Talbert, and defendant Liborio Ruiz Lopez, Jr., by his counsel James R. Greiner, hereby stipulate and agree that the status conference calendared for **Friday, May 19, 2006, at 9:00 a.m.** before the Honorable District Court Judge Garland E. Burrell, Jr. shall be continued to **Friday, June 16, 2006, at 9:00 a.m.**

Time can be excluded from the speedy trial act due to the fact that the government and the defendant are continuing in the process of discussions and negotiations in a good faith effort and attempt to resolve this matter short of trial; the government and defense are in the continuing process of exchanging proposals to resolve the case; the parties are continuing to close in on an agreement and the additional time will help in that process; government and the defense continue to have many discussions regarding this case and have had face to face meetings which are very productive and

1 both sides are diligently working toward a resolution in this case; additional time is needed to
2 accomplish this task; investigation by the parties is on going during the good faith efforts at
3 negotiating a resolution short of trial; the parties have been sharing information and continue to share
4 information in the on going good faith efforts at resolving this matter; when new information is
5 presented it is being investigated by both sides.

6 The parties stipulate and agree that time shall be excluded **through Friday, June 16, 2006,**
7 **under Title 18 section 3161(h)(8)(B)(ii) and Local Code T-4.**

8 Respectfully submitted,

9 McGREGOR W. SCOTT
10 UNITED STATES ATTORNEY

11 /s/ PHILLIP A. TALBERT by telephone authorization

12 DATED: 5-18-06

13 PHILLIP A. TALBERT
14 ASSISTANT UNITED STATES ATTORNEY
15 ATTORNEYS FOR THE PLAINTIFF

16 /s/ JAMES R. GREINER

17 DATED: 5-18-06

18 JAMES R. GREINER
19 ATTORNEY FOR DEFENDANT LOPEZ, JR.

20 **ORDER**

21 FOR GOOD CAUSE SHOWN, IT IS SO ORDERED.

22 Dated: May 22, 2006

23 /s/ Garland E. Burrell, Jr.
24 GARLAND E. BURRELL, JR.
25 United States District Judge
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